

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ROBERT BERGER	:	CIVIL ACTION
	:	
Plaintiff	:	
v.	:	NO. 2:20-cv-2026
	:	
WELTMAN, WEINBERG & REIS CO., LPA	:	
	:	
Defendant	:	JURY TRIAL DEMANDED
	:	

NOTICE OF REMOVAL

Defendant WELTMAN, WEINBERG & REIS, CO., L.P.A. (“Defendant”), by its undersigned counsel, hereby petitions this Court as follows, pursuant to 28 U.S.C. § 1441(a):

1. Defendant is a defendant in an action pending in the Court of Common Pleas of Allegheny County, Pennsylvania, No. AR-20-004502 entitled Robert Berger v. Weltman, Weinberg & Reis Co., LPA (“the State Court Action”). A true and correct copy of the Summons and Complaint are attached hereto as Exhibit “A”.

2. Plaintiff in the State Court Action is ROBERT BERGER (“Plaintiff”). See Exhibit “A”.

3. Plaintiff’s State Court Action alleges violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

4. The State Court Action involves a question of federal law. Pursuant to 28 U.S.C. § 1331, “The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”

5. Pursuant to 28 U.S.C. § 1441(a), “[a]ny civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the

defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending.”

6. Since this case arises out of alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*, Defendant may properly remove the State Court Action based on 28 U.S.C. § 1441(a).

7. This Notice has been filed with the Court within thirty (30) days after purported service of the Summons and Complaint on Defendant.

WHEREFORE, Defendant WELTMAN, WEINBERG & REIS, CO., L.P.A. prays that the State Court Action be removed from the Court of Common Pleas of Allegheny County, Pennsylvania, No. AR-20-004502 to this Court for proper and just determination.

KAUFMAN DOLOWICH & VOLUCK, LLP

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Dated: December 30, 2020

CERTIFICATE OF SERVICE

I, RICHARD J. PERR, ESQUIRE, hereby certify that on or about this date, I served a true and correct copy of the foregoing electronically via the Court's CM/ECF system and electronic mail on the following:

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/s/ Richard J. Perr
RICHARD J. PERR, ESQUIRE

Dated: December 30, 2020

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